UNITED STATES DISTRICT COURT SOUTHERN DISTRICT NEW YORK

In Re: New York City Policing During Summer

2020 Demonstrations

20 Civ. 8924 (CM)(GWG)

This filing is related to:

KRYSTIN HERNANDEZ, NATALIE BAKER, ETHAN CHIEL, KYLA RASKIN, REX SANTUS, ROXANNE ZECH, RAFAEL-LEV GILBERT, SARAH MILLS-DIRLAM, AUGUST LEINBACH, JALEN MATNEY, JONATHAN DAVIS, and DAVID HOLTON,

21 Civ. 7406 (CM)(GWG)

Plaintiffs,

- against -

THE CITY OF NEW YORK; NEW YORK CITY MAYOR BILL DE BLASIO; NEW YORK POLICE DEPARTMENT ("NYPD") COMMISSIONER DERMOT SHÈA; NYPD CHIEF OF DEPARTMENT TERENCE MONAHAN; NYPD DEPUTY COMMISSIONER FOR LEGAL MATTERS ERNEST F. HART; NYPD ASSISTANT CHIEF KENNETH LEHR; NYPD LEGAL BUREAU SERGEANT KENNETH RICE; NYPD STRATEGIC RESPONSE GROUP ("SRG") MEMBER FIRST NAME UNKNOWN ("FNU") RABEL; NYPD SUPERVISOR FNU HYLAND; and NYPD MEMBERS JOHN AND JANE DOES 1-157,

Defendants.

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STIPULATION

Pursuant to Federal Rule of Civil Procedure 26(d)(1), Plaintiffs Krystin Hernandez, Natalie Baker, Ethan Chiel, Kyla Raskin, Rex Santus, Roxanne Zech, Rafael-Lev Gilbert, Sarah Mills-Dirlam, August Leinbach, Jalen Matney, Jonathan Davis, and David Holton (the Hernandez Plaintiffs) and Defendants agree that the Hernandez Plaintiffs and Defendants may

immediately seek and serve discovery, including third-party discovery, relating to the claims,

defenses, and issues in Hernandez, civil action 21 Civ. 7406 (CM)(GWG). The parties further

agree that:

1. All parties will abide by the protective order entered as Docket 115 in civil action 20

Civ. 8924 (CM)(GWG) in this matter; and

2. All discovery that has been and will be conducted in the consolidated cases will be

deemed part of Hernandez, without the need for either party to re-disclose it,

respecting any confidentiality designations that are in place.

Dated: December

December 15 , 2021

New York, New York

[SIGNATURES ON FOLLOWING PAGE]

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COHEN&GREEN P.L.L.C.

Elena I//Cohen
J. Remy Green
Jessica Massimi

1639 Centre Street, Suite 216 Ridgewood (Queens), NY 11385 t: (929) 888-9480 f: (929) 888-9457

> e: elena@femmelaw.com remy@femmelaw.com jessica@femmelaw.com

-and-

Gideon Orion Oliver 277 Broadway, Suite 1501 New York, NY 10007 t: 718-783-3682 f: 646-349-2914 Gideon@GideonLaw.com

Attorneys for Hernandez Plaintiffs

NYC CITY LAW DEPARTMENT

By: Dara L. Weiss s/

Dara L. Weiss 100 Church Street New York, New York, 10007 (212) 356-3517

Phone: (212) 356-3517 Fax: (212) 356-3509 Daweiss@law.nyc.gov

Attorney for Defendants